Verataur, LLC FIFRA SSURO

Issue:

Ex (b)(5) - DPP; Ex (b)(7)(A) - law enforcement

Background:

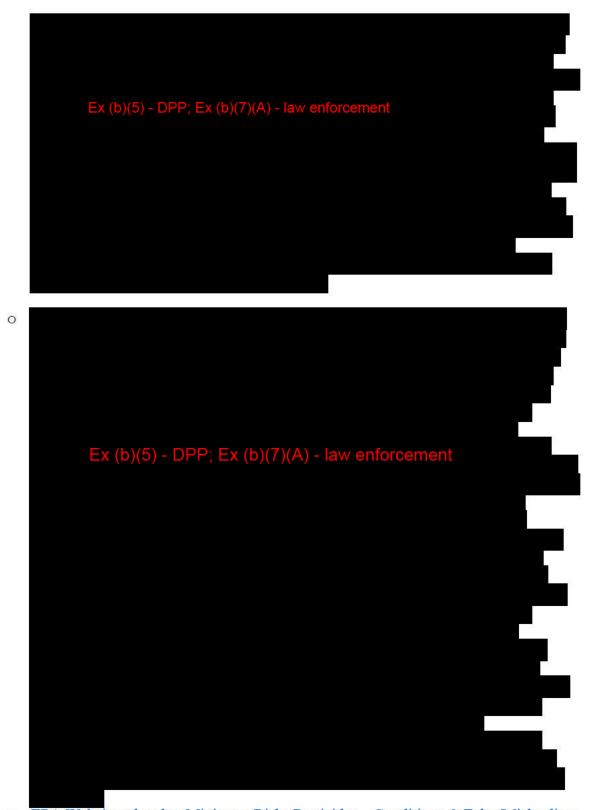
- Region 6 initiated an investigation of Respondents' compliance with FIFRA after receiving a
 complaint that the company was selling unregistered pesticides; specifically, the Product
 which is advertised as a disinfectant.
- Region 6 issued an NOPVOC to the Respondents on April 1, 2021 and confirmed while conferring with the company that the company has distributed the unregistered Product at least 100 occasions.
- Verataur, LLC has sold this product to a company called Maverick International, who in turn
 sold the product the HEB. After EPA issued an advisory letter to HEB and Maverick
 International, HEB later sued Maverick International. Verataur purchases the Product,
 BioErase Surface Wipes, from a company called Environmental Manufacturing Solutions
 located in Region 4. Environmental Manufacturing Solutions sells the product as, Purgo,
 which Verataur relabels as BioErase Surface Wipes.

Ex(b)(5) - DPP; Ex(b)(7)(A) - law enforcement

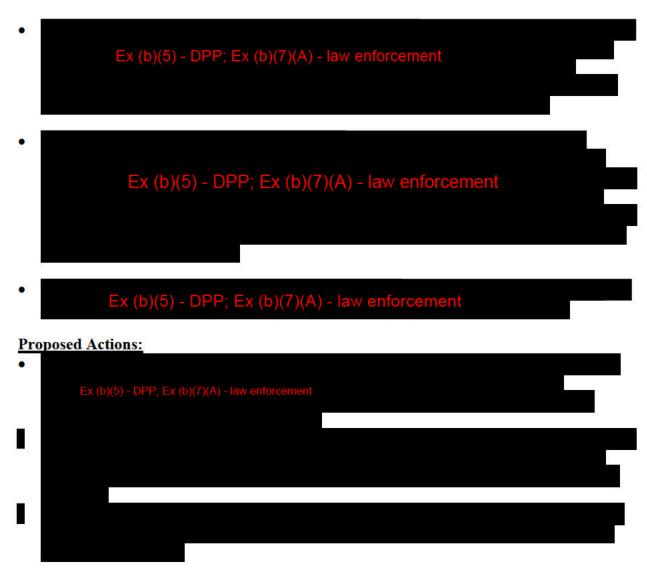
Key Points:

- <u>Size of Business</u>: Current information suggests a Category II (per the FIFRA ERP) size of business with approximately revenue of \$1 - \$10 million a year.
- Product Information Demonstrating Need for Registration:
 - The Product claims to be a minimum risk pesticide intended to be used for pesticidal purposes. The Product claims to be exempt from FIFRA regulation and product registration.

Ex (b)(5) - DPP; Ex (b)(7)(A) - law enforcement



o EPA Website related to Minimum Risks Pesticides – Conditions & False/Misleading Statements



Points of Contact:

• Region 6: Lawrence Pittman (ORC); Lee McMillan and Justin Mullenix (ECAD)

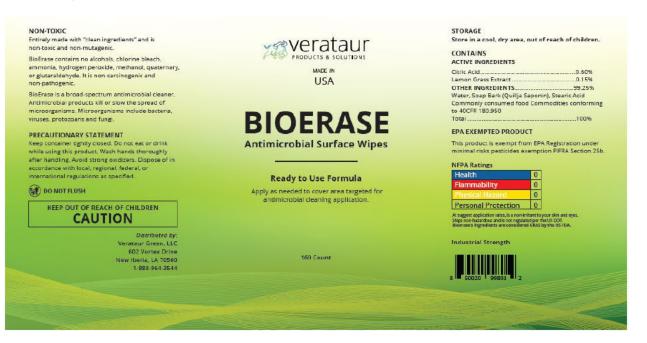
Product Information



TRANSITION BRIEFING PAPER



Labels may be found below.



TRANSITION BRIEFING PAPER

NON-TOXIC
Entirely made with "clean ingredients" and is non-toxic and non-mutagenic. Biocrase contains no clinicine bloochs ammonia, hydrogen persoide methanic, quaternary, or glutariadelyde, it is non-carcinogenic and non-pathogenic. Biocrase is a broad-spectrum aritmicro-bial cleaner. Aritmicrobal products Mill. Biocrase is a broad-spectrum aritmicro-bial cleaner. Aritmicrobal products Will. Microorganisms include bacterium. Microorganisms include bacterium.

PRECAUTIONARY STATEMENT
Keep container tightly closed. Do not
eat or drink while using this product.
Wash hands thoroughly after handling.
Avoid strong oxidizers. Dispose of in
accordance with local, regional, federal,
or international regulations as specified.

CAUTION





STORAGE Store in a cool, dry area. Out of reach of children.







BIOERASE WIPES

INGREDIENTS:

Active ingredients

Citric Acid	0.55%
Lemon Grass Extract	0.15%
Other ingredients	99.3%
Water, Soap Bark (Quillja Sa	ponin), Stearic Acid
Commonly consumed food to 40CFR 180.950	Commodities conforming
Total	100%

EPA EXEMPTED PRODUCT

This product is exempt from EPA Registration under minimal risks pesticides exemption FIFRA Section 25b.

NON-TOXIC

Entirely made with "clean ingredients" and is non-toxic and non-mutagenic.

Bioerase is a broad-spectrum antimicrobial cleaner. Antimicrobial products kill or slow the spread of microorganisms. Microorganisms include bacteria, viruses, protozoans, and fungi.



Bleach Free



Alcohol Free



Food Safe (GRAS)



FIFRA Exempt

